

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF TENNESSEE  
NORTHEASTERN DIVISION

UNITED STATES OF AMERICA	)	<b>FILED UNDER SEAL</b>
	)	
v.	)	No. <u>2:19-CR-00013</u>
	)	JUDGE CRENSHAW
GEORGIANNA A.M. GIAMPIETRO	)	

**MOTION TO EXCUSE PRESENCE OF COUNSEL**

The United States of America, by and through its attorney, the United States Attorney for the Middle District of Tennessee, respectfully requests that Assistant U.S. Attorney Ben Schrader be excused from the status conference scheduled today at 4:00 p.m. In support of that request, the government sets forth as follows:

On October 31, 2019, the Court directed all counsel of record to appear for a status conference in the above-referenced case at 4:00 p.m. on November 1, 2019. Since approximately 7:15 a.m. on October 31, 2019, however, undersigned government counsel and his wife have been at St. Thomas Midtown Hospital, where they welcomed their first child at approximately 8:34 p.m. on Halloween night. The family is currently recovering at the hospital and will not be discharged until Sunday, November 3, 2019. Undersigned government counsel will therefore be unable to attend the status conference today. Other counsel of record, however—namely, Assistant U.S. Attorney Phil Wehby—will be present for the government.

WHEREFORE, for good cause shown, the government respectfully requests that Assistant U.S. Attorney Ben Schrader be excused from appearing at the status conference today.

Respectfully submitted,

DONALD Q. COCHRAN  
United States Attorney for the  
Middle District of Tennessee

/s/ Ben Schrader  
Ben Schrader  
Assistant United States Attorney

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was sent via e-mail transmission to counsel for the defendant this 1<sup>st</sup> day of November, 2019.

/s/ Ben Schrader  
Ben Schrader  
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